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October 12, 2007

Hon. Victor Marrero, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street, Room 660
New York, New York 10007

USDS SDNY
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Re: Trustees of the Mason Tenders District Council Welfare Fund,
et al. v. Metro Demolition Contracting Corp., *et al.*
07 Civ. 3608 (VM)

Dear Judge Marrero:

This letter is submitted on behalf of the Plaintiffs in the above-referenced action to request a pre-motion conference, pursuant to Your Honor's Individual Practices and Local Civil Rule 37.2.

Plaintiffs wish to make a motion to compel discovery. On August 20, 2007, Plaintiffs served their First Document Request and First Set of Interrogatories on counsel for Defendants World Class Demolition Corporation and Maurizio Bordone. No response or objections to these discovery requests was received. On October 2, 2007, I sent a letter to said defendants' counsel, Mark L. Hankin, requesting responses to these discovery requests. As of this date, I have not received any response to the outstanding discovery requests nor have I received any response of any kind to my October 2nd letter.

Plaintiffs therefore respectfully request that a pre-motion conference be scheduled at the Court's earliest convenience.

Respectfully,

Sally L. Schneider
Sally L. Schneider

cc: Mark L. Hankin, Esq.,
Hankin, Handwerker & Mazel, P.C.
Attorneys for Defendants World Class
Demolition Corporation and Maurizio Bordone

The Court deems this letter as a motion to compel discovery. No conference shall be necessary. Defendants are directed to comply with the discovery demands described above by 10-19-07, or show cause why compliance has not been or cannot be made by then. In the event a dispute arises in this regard, the parties shall address it to the designated judge, to whom the matter will be referred.
SO ORDERED:
DATE 10-16-07 VICTOR MARRERO U.S.D.J.